

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Libbey Glass, Inc.  
Shreveport Plant  
Shreveport, Caddo Parish, Louisiana  
Agency Interest Number: 1207  
Activity Number: PER20050001  
Draft Permit 0500-00004-V2**

**I. APPLICANT:**

**Company:**

Libbey Glass, Inc..  
4302 Jewella Avenue, Shreveport, Caddo, LA 71109

**Facility:**

Shreveport Plant  
4302 Jewella Avenue, LA, 71109  
Approximate UTM coordinates are 425.00 kilometers East and 3592.50  
kilometers North, Zone 15

**II. FACILITY AND CURRENT PERMIT STATUS:**

The Libbey Glass, Shreveport Plant manufactures glass tableware utilizing three natural gas fired glass melting furnaces to convert raw materials into molten glass. The molten glass is formed and shaped into tableware products. A portion of the formed glassware is decorated with colored ceramic enamels, a glass forming operation, annealing lehrs and packaging operations. The facility decorates with various enamels which must be cured with decorating lehrs. The decorative chromium electroplating operations were removed from the facility in 2002. Ancillary operations include assembly of corrugated containers for storage, shipping of product, repairs to mold, and machine equipment. Emissions consist of products of combustion with minor emissions from other sources.

The Shreveport Plant currently operates under Permit No. 0500-00004-01, issued October 6, 2004.

**Libbey Glass, Inc.  
Shreveport Plant  
Shreveport, Caddo Parish, Louisiana  
Agency Interest Number: 1207  
Activity Number: PER20050001  
Draft Permit 0500-00004-V2**

**III. PROPOSED PERMIT / PROJECT INFORMATION:**

**Proposed Permit**

A renewal permit application and Emission Inventory Questionnaire were submitted by Libbey Glass, Inc. on September 16, 2005 requesting a Part 70 operating permit. Additional information dated November 30, 2005 was also received.

**Project Description**

This permit reflects a renewal therefore no emissions have changed since the previous permit modification.

**Permitted Air Emissions**

The permitted emission rates are a reflection of the current operating conditions at the Shreveport Plant. The sources of emissions are glass melting furnaces, decorating lehrs and other sources relevant to the finishing and packing of the final product. The permitted emission rates are in tons per year as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	179.57	179.57	—
SO <sub>2</sub>	175.57	175.57	—
NO <sub>x</sub>	1207.74	1207.74	—
CO	18.77	18.77	—
VOC	38.17	38.17	—
Lead	0.000198	0.000198	—
Cadmium	0.0000175	0.0000175	—

**Regulatory Analysis**

This application was reviewed for compliance with the Louisiana Part 70 operating permit program, Louisiana Air Quality Regulations, Louisiana Comprehensive TAP Emission Control Program, NSPS, NESHAP, CAM and PSD regulations.

**Libbey Glass, Inc.  
Shreveport Plant  
Shreveport, Caddo Parish, Louisiana  
Agency Interest Number: 1207  
Activity Number: PER20050001  
Draft Permit 0500-00004-V2**

**Louisiana Air Quality Regulations and NSPS**

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the draft permit, or Table 1 of the draft permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit.

**Prevention of Significant Deterioration Applicability**

The current facility does not have the potential to meet the definition of a Major Stationary Source with respect to the Prevention of Significant Deterioration (PSD) regulations.

**MACT Requirements**

This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51, therefore Maximum Achievable Control Technology and the NESHAP regulations do not apply.

**Air Modeling Analysis**

Not Applicable. Impact on air quality from the emissions of the facility will be below the National Ambient Air Quality Standards (NAAQS) and the Louisiana Ambient Air Standards (AAS) beyond industrial property.

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

**Libbey Glass, Inc.  
Shreveport Plant  
Shreveport, Caddo Parish, Louisiana  
Agency Interest Number: 1207  
Activity Number: PER20050001  
Draft Permit 0500-00004-V2**

**IV. PERMIT SHIELDS**

No permit shield was requested.

**V. Periodic Monitoring**

Federal regulation 40 CFR 64 Compliance Assurance Monitoring is not applicable to this facility. The facility is not a major source for any regulated air pollutant thereby exempting them from any monitoring.

<b>VI. Explanation for Exemption Status or Non-Applicability of a Source</b>		
<b>ID No:</b>	<b>Requirement</b>	<b>Notes</b>
Entire Facility	NSPS Subpart CC – Standards of Performance for Glass Manufacturing Plants [40 CFR 60.290]	DOES NOT APPLY. Facility has not been reconstructed or modified since June 15, 1979.
	NESHAP Subpart N – National Emission Standard for Inorganic Arsenic Emissions from Glass Manufacturing Plants [40 CFR 61.160]	DOES NOT APPLY. Commercial arsenic is not used as a raw material.
Entire Facility ARE 15 Decorating Screen Room Operations	Comprehensive Toxic Air Pollutant Emission Control Program. [LAC 33:III.51]	EXEMPT. The facility is not a major source of Toxic Air Pollutants as defined in LAC 33:III.5103.
EQT 10-12 Glass Melting Furnaces EQT 14,15,18,21 Heat Treats EQT 22-27 Decorating Lehrs	Emission Standards for Sulfur Dioxide Continuous Emissions Monitoring [LAC 33:III.1511.A]  Emissions Standards for Sulfur Dioxide Recordkeeping and Reporting [LAC 33:III.1513]	EXEMPT. Units emit less than 250 tons of SO <sub>2</sub> per year. Record and retain at the site for at least 2 years the data required to demonstrate compliance with or exemption from SO <sub>2</sub> standards of Chapter 15. Compliance data shall be reported annually in accordance with LAC 33:III.918.

**Libbey Glass, Inc.**  
**Shreveport Plant**  
**Shreveport, Caddo Parish, Louisiana**  
**Agency Interest Number: 1207**  
**Activity Number: PER20050001**  
**Draft Permit 0500-00004-V2**

VII. STREAMLINED REQUIREMENTS			
Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Shreveport Plant	None		

**Libbey Glass, Inc.**  
**Shreveport Plant**  
**Shreveport, Caddo Parish, Louisiana**  
**Agency Interest Number: 1207**  
**Activity Number: PER20050001**  
**Draft Permit 0500-00004-V2**

**Glossary**

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring rule – A federal air regulation under 40 CFR Part 64

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide (H<sub>2</sub>S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

NESHAP - National Emission Standards for Hazardous Air Pollutants – Toxic air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

Nitrogen Oxides (NO<sub>x</sub>) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air

**Libbey Glass, Inc.  
Shreveport Plant  
Shreveport, Caddo Parish, Louisiana  
Agency Interest Number: 1207  
Activity Number: PER20050001  
Draft Permit 0500-00004-V2**

Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

NSPS - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

Organic Compound - Any compound of carbon and another element. Examples: Methane ( $\text{CH}_4$ ), Ethane ( $\text{C}_2\text{H}_6$ ), Carbon Disulfide ( $\text{CS}_2$ )

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

$\text{PM}_{10}$ - Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide ( $\text{SO}_2$ ) – An oxide of sulphur.

TAP - Toxic Air Pollutant (LDEQ acronym for air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.